

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)		Judge Richardson
GUIDEPOST SOLUTIONS LLC; and)		Magistrate Judge Frenzley
EXECUTIVE COMMITTEE OF THE)		Jury Demand
SOUTHERN BAPTIST CONVENTION,)		
)	
Defendants.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO MOTIONS TO DISMISS**

Plaintiff Johnny M. Hunt respectfully moves the Court for an extension of time up to and including June 9, 2023, to respond to the Motion to Dismiss filed by the Southern Baptist Convention [D.E. 29], the Motion to Dismiss filed by Guidepost Solutions LLC [D.E. 25], and the Motion to Dismiss filed by the Executive Committee of the Southern Baptist Convention [D.E. 31]. Plaintiff's responses to Defendants' respective Motions to Dismiss are currently due on May 18, 2023.

Counsel for Plaintiff has contacted the respective counsels for the Southern Baptist Convention, Guidepost Solutions LLC, and the Executive Committee of the Southern Baptist Convention, all of whom have confirmed there is no opposition to this Motion. Plaintiff therefore respectfully requests entry of an Order giving him an extension of time up to and including June 9, 2023, in which to respond to the Motion to Dismiss filed by the Southern Baptist Convention

[D.E. 29], the Motion to Dismiss filed by Guidepost Solutions LLC [D.E. 25], and the Motion to Dismiss filed by the Executive Committee of the Southern Baptist Convention [D.E. 31].

Dated: May 16, 2023

Respectfully submitted,

/s/ Andrew Goldstein

Todd G. Cole, Esq., BPR # 031078
Andrew Goldstein, Esq., BPR # 037042
COLE LAW GROUP, P.C.
1648 Westgate Circle, Suite 301
Brentwood, TN 37027
Telephone: (615) 490-6020
Fax: (615) 942-5914
tcole@colelawgrouppc.com
agoldstein@colelawgrouppc.com

-and-

Robert D. MacGill, Esq. (*pro hac vice*)
Scott E. Murray, Esq. (*pro hac vice*)
Patrick J. Sanders, Esq. (*pro hac vice*)
MACGILL PC
156 E. Market St.
Suite 1200
Indianapolis, IN 46204
Telephone: (317) 721-1253
robert.macgill@macgilllaw.com
scott.murray@macgilllaw.com
patrick.sanders@macgilllaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Unopposed Motion for Extension of Time to Respond to Motions to Dismiss to be electronically filed with the Clerk of the Court on May 16, 2023, using the CM/ECF system, which will automatically serve all counsel of record listed below:

E. Todd Presnell, Esq.
Scarlett Singleton Nokes, Esq.
R. Brandon Bundren, Esq.
BRADLEY ARANT BOULT CUMMINGS LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37203
snokes@bradley.com
bbundren@bradley.com

L. Gino Marchetti, Jr., Esq.
Matthew C. Pietsch, Esq.
TAYLOR, PIGUE, MARCHETTI & BLAIR, PLLC
2908 Poston Avenue
Nashville, Tennessee 37203
gmarchetti@tpmblaw.com

Counsel for the Southern Baptist Convention

Gene R. Besen, Esq.
BRADLEY ARANT BOULT CUMMINGS LLP
Fountain Place
1445 Ross Avenue, Suite 3600
Dallas, Texas 75202

*Counsel for the Executive Committee of the
Southern Baptist Convention*

John R. Jacobson, Esq.
Katharine R. Klein, Esq.
RILEY & JACOBSON, PLC
1906 West End Avenue
Nashville, Tennessee 37203
jjacobson@rjfirm.com
kklein@rjfirm.com

Steven G. Mintz, Esq.
Terence W. McCormick, Esq.
MINTZ & GOLD LLP
600 Third Avenue, 25th Fl.
New York, New York 10016
mintz@mintzandgold.com
mccormick@mintzandgold.com

Counsel for Guidepost Solutions LLC

/s/ Andrew Goldstein

ANDREW GOLDSTEIN